




Irrigated Lands Regulatory Program Costs of Compliance

April 9, 2013



Stakeholder Group Meetings

- All stakeholder meeting held February 20th
 - Core group has met regularly & continues reaching out to larger Ag. community.
 - Continue to collect actual costs incurred by farmers.
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Overview

- Evolving ILRP in multiple regions.
- Significant changes to the Central Valley & Central Coast programs that both stakeholders & program staff are navigating.
- Lessons will be learned as program matures.
- Geographical & commodity diversity present challenges unique to the ILRP.



Cost Impacts

➤ SWRCB fee from 12¢/acre to 56¢/acre.



➤ Coalition fee from \$1/acre to \$6/acre.

➤ Paperwork costs.

➤ Management Practices.




Cost Impacts



- \$50 million in the Central Valley for monitoring.
- \$200,000 in the Central Coast to develop the agricultural proposals.
- Addition of groundwater is doubling costs.
- ESJWQC has doubled their per acre fee.
- \$4/acre to \$620/acre range in the Central Coast.
- Growers are hiring consultants to complete necessary compliance paperwork.



Management Practices Costs

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- CVRWQCB noted “most of the estimated cost of \$30 to \$189/acre for farmers implementing the groundwater program in the Tulare Lake Basin will be due to investment in additional management practices.”

Moving Targets

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- New groundwater elements
 - TST
 - CV-SALTS
 - Biological Objectives
 - Nitrates in drinking water recommendations



Recommendations

- Interpretation of Porter-Cologne and the Clean Water Act is inconsistent statewide on the ILRP.
- We support best mgmt. practices, treatment, and control pilot projects in determining if new regulatory standards are achievable.
- Is agency duplication necessary? Example would be DPR's Groundwater Protection Program and how their expertise helps.



Recommendations

- Independent economic analysis should be incorporated in the ILRP regulatory process.
- Conflicts between water quality and food safety regulations and practices.
- SWRCB should prioritize common recommendations amongst the stakeholder groups.
- Develop implementation plan around those common themes.



Economic Analysis Tools

➤ U.S. EPA

*EPA Tool Helps Estimate the Affordability of
Water Pollution Control Requirements*

➤ Cal Poly

An estimation of the regulatory cost on Ca. Ag. Producers

➤ Economic & Cost Analysis of the Central Coast Ag Order & Ag Alternative

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Questions?

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